

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE)	CHAPTER 13
)	
)	CASE NO.: 22-13375-AMC
)	
ALKAREEM QAADIR LOGAN,)	
Debtor)	
~~~~~	)	
WESTLAKE FINANCIAL SERVICES,	)	
Movant	)	
vs.	)	<b>HEARING DATE:</b>
	)	Tuesday, April 18, 2023
	)	11:00 A.M.
ALKAREEM QAADIR LOGAN,	)	
Respondent(s)	)	
and	)	
	)	
KENNETH E. WEST	)	<b>LOCATION:</b>
Trustee	)	900 Market Street, Suite 400
	)	Courtroom No. 4
	)	Philadelphia, PA 19107

**MOTION FOR RELIEF FROM AUTOMATIC STAY**

AND NOW, comes the above-captioned Movant, Westlake Financial Services, by and through their attorney, Regina Cohen, who files this Motion based upon the following:

1. The Movant is a corporation having a principal place of business located at 4751 Wilshire Blvd., Ste. 100, Los Angeles, CA 90010.
2. The Respondent, Alkareem Qaadir Logan is an individual with a mailing address at 3600 Conshohocken Avenue, #2104, Philadelphia, PA 19131, who has filed a Petition under Chapter 13 of the Bankruptcy Code.
3. On or about July 07, 2022, Debtor Alkareem Qaadir Logan entered into a Retail Installment Sales Contract, involving a loan in the amount of \$16,981.05 for the purchase of a 2013 Audi A6 2.0T Premium Plus Sedan 4D.
4. The vehicle secured by the Contract has V.I.N. WAUGFAFC6DN151130.
5. Movant is the assignee of the Contract.

6. The above – described vehicle is encumbered by a lien with a payoff in the amount of \$18,107.30 plus other appropriate charges as of March 21, 2023 but subject to change. The regular monthly payment is \$432.63 at an interest rate of 20.49%.

7. Applying payments received to the earliest payment due, payments have been missed post-petition, since January 02, 2023 in the amount of \$1,297.89, plus all applicable late charges, interest, attorneys' fees and costs plus Pre-Petition Payments of \$441.28.

8. The Property has a Kelley Blue Book Value of \$11,142.00.

9. The vehicle is not necessary to an effective reorganization.

10. The Movant is the only lienholder of record with regard to the vehicle.

11. In order to proceed with repossession of the vehicle, relief from the automatic stay must be obtained.

12. Failure to make adequate protection payments is cause for relief from the automatic stay.

13. The Movant has incurred attorney's fees in the filing of this Motion.

14. The vehicle is a rapidly depreciating asset. Movant requests the waiver of Rule 4001(a)(3).

WHEREFORE, Movant prays for your Honorable Court to enter an Order permitting the Movant to proceed with the repossession proceedings of the aforementioned vehicle.

Respectfully submitted,  
Lavin, Cedrone, Graver, Boyd & DiSipio

/s/ Regina Cohen  
Regina Cohen  
Attorney for Movant  
Suite 500 190 North Independence Mall West 6th &  
Race Streets  
Philadelphia, PA 19106  
(215) 351-7551